

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED

FEB 08 2002

LUIS CAVAZOS,

Plaintiff,

v.

JEREMY VOORHIES,

Defendant.

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

00 C 7929

Judge Guzman


NOTICE OF MOTION

TO: Blake W. Horowitz
155 North Michigan Avenue
Suite 714
Chicago, Illinois 60601

DOCKETED
FEB 13 2002

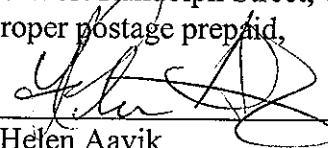
PLEASE TAKE NOTICE that on the 14th day of February 2002 at 9:30 a.m., or as soon thereafter as counsel may be heard, I shall appear before the Hon. Ronald A. Guzman, or whomsoever may be sitting in his stead in room 1219, at 219 South Dearborn Street, Chicago, Illinois, and then and there present the attached **Agreed Motion to Alter Briefing Schedule**, a copy of which is hereby served upon you.

JAMES E. RYAN
Attorney General of Illinois


Helen Aavik/Patrick Solberg
Assistant Attorneys General
General Law Bureau
100 West Randolph Street
13th Floor
Chicago, Illinois 60601
(312) 814-6133/3654

CERTIFICATE OF SERVICE

The undersigned attorney certifies that she served the foregoing Notice and attached papers addressed to Blake Horowitz, 155 North Michigan Ave., Suite 710, Chicago, Illinois 60601, by depositing the same in the regular U.S. mail at 100 West Randolph Street, Chicago, Illinois 60601, on February 8, 2002 before 5:00 p.m., with proper postage prepaid.


Helen Aavik

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
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AGREED MOTION TO ALTER SUMMARY JUDGMENT BRIEFING SCHEDULE

The defendant, Jeremy Voorhies, by and through his attorney James E. Ryan, Attorney General of Illinois, and the plaintiff Luis Cavazos, by and through his attorney Blake Horowitz, move to alter the existing summary judgment briefing schedule on the basis that one deposition remains to be conducted, and in support states as follows:

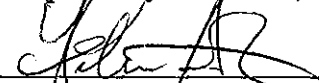
1. On January 9, 2002, this Court entered an order setting the briefing schedule for the defendant's motion for summary judgment in this matter. Pursuant to that order, the defendant was to file his motion on or before February 4, 2002, plaintiff's response due on or before March 1, 2002, and defendant's reply due on or before March 18, 2002. This Court also ordered discovery closed.
2. On January 31, 2002, on an agreed motion by the parties, this Court entered an order allowing discovery re-opened for the sole purpose of allowing the plaintiff to depose Lieutenant Hooks.

3. Lieutenant Hooks deposition is currently being scheduled.
4. Because the deposition of Lieutenant Hooks will occur after the existing due date for the defendant's motion for summary judgment, the parties request that the briefing schedule be altered.
5. Plaintiff has no objection to altering the summary judgment briefing schedule.
6. This motion is brought in good faith and not for the purposes of frustration or delay.

WHEREFORE the parties request that this Court enter an order altering the existing summary judgment briefing schedule.

JAMES E. RYAN
Attorney General of Illinois

Respectfully submitted,


Helen Aavik/Patrick J. Solberg
Assistant Attorneys General
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